

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-2(c)**

KARINA PIA LUCID, ESQ., LLC  
3640 Valley Road, Suite 2-A  
PO Box 230  
Liberty Corner, New Jersey 07938-0230  
Tel: (908) 350-7505  
Email: klucid@karinalucidlaw.com  
Karina Pia Lucid, Esq.

In Re:  
Brian Schoener and Amy Schoener

Case No.: 18-26593 (MBK)  
Chapter: 13  
Judge: Michael B. Kaplan

**NOTICE OF REQUEST FOR LOSS MITIGATION – BY THE DEBTOR**

I am/ We are the debtor(s) in this case and hereby request loss mitigation with respect to:

Property address: 43 Milestone Drive, Ringoes, NJ 08551

Creditor is the holder of:  first mortgage or  second mortgage.

I/We will make adequate protection payments to the above creditor each month in the following amount during the loss mitigation period: See Loss Mitigation Program and Procedures, Section V.A.1.a and VII.B.

Creditor Provident Bank Amount: \$ 2984.64 Due date: 10/1/2018

I/We request to be excused from using the Loss Mitigation Portal due to undue hardship as set forth in detail below:

I understand that if the court orders loss mitigation in this case I am required to comply with the Loss Mitigation Program and Procedures and will participate in good faith. I understand that Loss Mitigation is voluntary, and that I am not required to enter into any agreement or settlement with any other party as part of this Loss Mitigation, and understand that no other party is required to enter into any agreement or settlement with me. I also understand that I am not required to request dismissal of this case as part of any resolution or settlement that is offered or agreed to during the Loss Mitigation Period. I also certify that the property in question consists only of real property in which I hold an interest used as a principal residence.

Date: 9/13/2018

/s/ Brian Schoener  
Debtor

Date: 9/13/2018

/s/ Amy Schoener  
Joint Debtor (if any)

**Debtor Information:**

Print full name: Brian Schoener and Amy Schoener

Mailing address: 43 Milestone Drive, Ringoes, NJ 08551 (Hunterdon County)

Telephone number: \_\_\_\_\_

Email address (if any): \_\_\_\_\_

**Debtor's Attorney Information:**

Name: Karina Pia Lucid, Esq, LC d/b/a Lucid Law, Debt Relief Attorneys

Address: PO Box 230 Liberty Corner, NJ 07938

Telephone number: 908.350.7505 Fax number: 908.350.4505

Email address (if any): klucid@karinalucidlaw.com admin@karinalucidlaw.com

**Creditor Information: (if known)**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax number: \_\_\_\_\_

Email address (if any): \_\_\_\_\_

**Creditor's Attorney Information: (if known)**

Name: Pluese Becker & Saltzman, LLC Attn: Robert Saltzman

Address: 20000 Horizon Way, Suite 900, Mount Laurel, NJ 08054

Telephone number: 856-813-1700 Fax number: \_\_\_\_\_

Email address (if any): dnj@pbslaw.org

**Pursuant to Section V.A.1.a. of the Loss Mitigation Program and Procedures, the above named creditor has 14 days to file with the court, and serve on the debtor, debtor's attorney and trustee, an objection to this Request.**

Revised 9/19/13